

Kent R. Robison, Esq., (NSB# 1167)
 Michael A. Burke, Esq., (NSB# 11527)
 Hannah E. Winston, Esq. (NSB# 14520)
ROBISON, SHARP, SULLIVAN & BRUST
 71 Washington Street
 Reno, Nevada 89503
 Telephone: (775) 329-3151
 Emails: krobison@rssblaw.com
mburke@rssblaw.com
hwinston@rssblaw.com

*Attorneys for Proposed Intervenor Rebecca Flynn- Williams
 As Successor Trustee for the Laima Flynn Trust*

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

MICHAEL J. FLYNN and PHILIP
 STILLMAN,

Plaintiffs,

vs.

MICHAEL E. LOVE, an individual; and
 JACQUELINE LOVE, an individual;
 MICHAEL E. LOVE as TRUSTEE OF
 THE MICHAEL LOVE FAMILY TRUST;
 MELECO, INC., a Nevada corporation;
 and DOES 1-10,

Defendants.

REBECCA FLYNN-WILLIAMS, AS
 SUCCESSOR TRUSTEE OF THE LAIMA
 FLYNN TRUST,

Intervenor

Case No.: 3:19-CV-00239- MMD-CLB

**STIPULATION AND [PROPOSED]
 ORDER TO EXTEND TIME TO
 OPPOSE DEFENDANTS' MOTION
 FOR PARTIAL SUMMARY
 JUDGMENT**

(Second Request)

Plaintiffs MICHAEL J. FLYNN (individually, "Flynn") and PHILIP STILLMAN ("Stillman"), in proper person (collectively, "Plaintiffs"), and Defendants MICHAEL E. LOVE, JACQUELINE LOVE, MICHAEL E. LOVE as Trustee of the Michael Love Family Trust, and MELECO, INC. (collectively, "Defendants"), through their attorneys of record, and Intervenor REBECCA FLYNN-WILLIAMS, AS SUCCESSOR TRUSTEE OF LAIMA FLYNN TRUST (the "Trust"), represented by Kent R. Robison, Esq., Michael A. Burke, Esq., and Hannah E. Winston, Esq., of the law offices Robison, Sharp, Sullivan & Brust, hereby stipulate to extend the time to file an opposition to Defendants' Motion for Partial Summary Judgment (ECF 265). The

current deadline to file the opposition is October 5, 2022 pursuant to the First Request to extend the deadline to file the opposition (ECF 268). Plaintiffs and the Trust request an extension to file the opposition on or before October 7, 2022.

The Parties hereby agree that the above requested extension is made in good faith and not for the purpose of delay. The attorney taking the lead in drafting the joint opposition (Hannah E. Winston, Esq.) had a family emergency that unfortunately delayed finalizing the joint opposition by close of business on October 5, 2022. Notwithstanding, the opposition will be finalized and filed no later than October 7, 2022.

IT IS SO STIPULATED.

DATED this 5th day of October, 2022.

/s/ Michael J. Flynn
MICHAEL J. FLYNN, ESQ.
In Proper Person

DATED this 5th day of October, 2022.

/s/ Philip Stillman
PHILIP STILLMAN, ESQ.
In Proper Person

DATED this 5th day of October, 2022.

ROBISON, SHARP, SULLIVAN & BRUST
71 Washington Street
Reno, Nevada 89503

/s/ Michael A. Burke
KENT R. ROBISON
MICHAEL A. BURKE
HANNAH E. WINSTON
Attorneys for the Rebecca Flynn- Williams
As Successor Trustee for the Laima Flynn Trust

///

///

///

1
2
3 DATED this 5th day of October, 2022

4 GREENBERG TRAURIG, LLP
5 10845 Griffith Peak Drive, Suite 600
6 Las Vegas, Nevada 89135

7 /s/ Mark E. Ferrario
8 MARK E. FERRARIO, ESQ.
9 JASON K. HICKS, ESQ.
10 *Attorneys for Defendants*

11 **IT IS SO ORDERED.**

12 DATED this 6th day of October, 2022

13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28



UNITED STATES MAGISTRATE JUDGE